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Mr. Frazer Lockhart  
U. S. Department of Energy  
Rocky Flats Office  
P.O. Box 928  
Golden, Colorado 80402-0928

RE: Storage and Handling of Investigation Derived Waste (IDW) and  
Hazardous Investigation Derived Waste (HIDW)

Dear Mr. Lockhart,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division), is forwarding this letter to give DOE and EG&G further guidance on acceptable storage and handling protocols for HIDW. In doing so, we hope to clarify several issues that have been the subject of staff level discussions. These issues all involve coordination between the Environmental Management Division of EG&G and Waste Operations.

Based on previous correspondence and staff level meetings, the Division believes that DOE and EG&G have developed appropriate procedures for containerizing and sampling IDW, for making a tentative hazardous waste determination of the IDW based on "process knowledge," and for moving waste into the 90-day storage area and the Interim Status storage areas. It is from that point on that the Division believes further guidance is warranted.

Because of the heterogeneous nature of IDW and the unknown concentration of hazardous constituents within the waste, any IDW moved into the 90-day or Interim Status storage areas is initially placed there pending characterization. If the results determine that the waste fails the clean closure performance standards, then the waste must be managed as a hazardous waste (see attachments). However, if the IDW meets the above standards, then it has exited the hazardous waste and solid waste universe and is again only an environmental media. This means that it can be removed from storage and disposed of according to SOP FO.8.

When the results determine that the IDW must be managed as a hazardous waste (HIDW), it must be placed in an appropriate permitted or Interim Status storage area, if it is not already there. However, the HIDW remains a part of the Operable Unit (OU) in which it was generated. It is being stored and managed only because returning it to the OU could, or would, exacerbate the cleanup. The result is that the HIDW will be stored until a remedy has been chosen and implemented in the OU. At that time, the HIDW will be removed from storage and remedied along with any material in the OU that exceeds the clean closure performance standards.

The principle ramification of both of the above issues to waste management is that IDW and HIDW will not always be treated or disposed of in the same manner as hazardous waste or low-level hazardous waste. Both IDW and HIDW may exit the waste management system: IDW - when results show it to be "clean"; HIDW - during the remedy. Any waste management program for IDW and HIDW must include the flexibility to take this into account.

If you have any questions regarding these matters, please call Joe Schieffelin of my staff at 331-4421.

Sincerely,

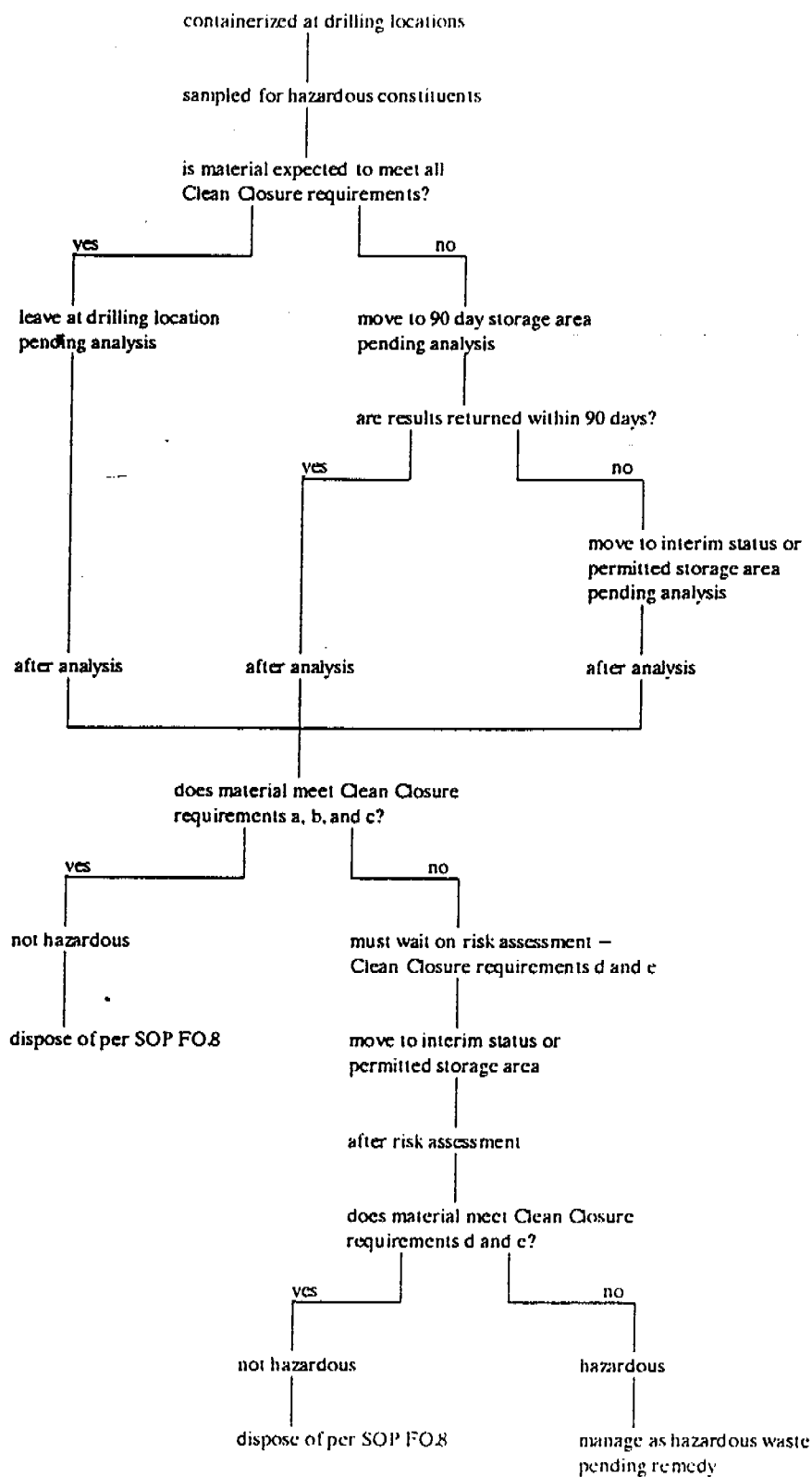


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cc: Daniel S. Miller, AGO  
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# INVESTIGATION DERIVED WASTE (IDW)

## Drill Cuttings



## INVESTIGATION DERIVED WASTE

### Clean Closure Performance Standards:

In order to exclude an investigation derived waste from the hazardous waste universe (media contaminated with either listed hazardous waste or hazardous constituents), the media must comply with the following Clean Closure Performance Standards. For compliance to be evaluated, the media must be analytically determined to contain levels of contaminants that:

- a) are nondetect for organic compounds except for those that are naturally occurring and
- b) are less than or equal to background levels plus two standard deviations for inorganic and naturally occurring organic compounds and
- c) do not exhibit any characteristic of a hazardous waste, as defined in CHWR Section 261, Subpart C

or

- d) present risk to human health less than or equal to  $1 \times 10^{-6}$ , using a risk analysis procedure approved by the Director for carcinogenic compounds and
- e) present a Hazard Index less than 1.0 for non-carcinogenic compounds.